

ATTACHMENT 1

Exhibit No.	ECF No.	Description	Basis for Sealing
Plaintiffs' Exhibits			
Plaintiff's Exhibit ("PX") 65	671-14	Email correspondence from S. Edlavitch to C. Koepke, <i>et al.</i> , with subject "TRACKER," dated February 5, 2021, with Bates number CMS-ADS-0000250880.	Plaintiffs request redactions colored yellow because they contain contact information for CMS staff, which, if disclosed, would threaten to disrupt orderly and efficient agency operations. <i>See</i> Decl. of Christopher Koepke (CMS) ¶¶ 12, 14, ECF No. 666-12.
PX 68	671-15	A document titled "Client Authorization to Buy #1," dated February 1, 2021, with Bates number range CMS-ADS-0001139301.	Plaintiffs request redactions colored yellow because they contain contact information for CMS staff, which, if disclosed, would threaten to disrupt orderly and efficient agency operations. <i>See</i> Decl. of Christopher Koepke (CMS) ¶¶ 11, 14, ECF No. 666-12.
PX 70	659-8	FY 2022 media plan and cover email, with beginning Bates number ARMY-ADS-0000336340.	Plaintiffs request redactions colored yellow because (a) metrics and data in this document are commercially sensitive and not available to the general public, and making them available on the public docket could prejudice the Army's ability to conduct business, and (b) contact information for Army staff included in the documents cited in this declaration is not widely published or available to the general public as a matter of course, and making it available on the public docket threatens to disrupt orderly and efficient agency operations. <i>See</i> Decl. of Col. John Horning (Army) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶¶ 8–9 (filed herewith).
PX 72	671-17	Excerpt of a 2022 media plan showing digital and display budgets and channel recommendations, and a cover email approving the plan, with a Beginning bates number NAVY-ADS-0000045197.	Plaintiffs request redactions colored yellow because contact information for Navy staff is not widely published or available to the general public as a matter of course and making it available on the public docket threatens to disrupt orderly and efficient agency operations. <i>See</i> Decl. of Allen Owens (Navy) ¶ 9, ECF No. 666-17.

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PX 78	671-21	Excerpts from a presentation titled “FY’22 Holiday Media Recommendation,” dated September 17, 2021, with Bates number range USPS-ADS-0000064864 to USPS-ADS-0000064942.	<p>Plaintiffs request redactions colored yellow for the following:</p> <ol style="list-style-type: none"> 1. Pages with Bates numbers USPS-ADS-0000064876, -909, and -913 because they include past and prospective spend allocations for different categories of advertising. Disclosure of such information would allow USPS’s competitors to plan counterprogramming, and otherwise gain a competitive advantage against USPS, knowing which channels USPS emphasizes in its advertising strategy; and 2. Pages with Bates numbers USPS-ADS-0000064914–915, -931-32, -934, -940, -942 because they contain strategic discussion regarding different types of advertising, key performance indicators, and timelines, which, if disclosed, would allow USPS’s competitors to plan counterprogramming to the detriment of USPS’s business. <p>While the information in this presentation is from September 2021, there is sufficient continuity in USPS’s spending strategies that all the requested redactions contain information that remains very valuable to USPS’s competitors that would allow them to be able to accurately estimate USPS’s current spending.</p> <p><i>See</i> Decl. of Christopher Karpenko (USPS) ¶¶ 9–10, ECF No. 666-19.</p>
PX 91	672-5	Excerpt of a conformed copy of the Air Force’s advertising contract with GSD&M,	Plaintiffs request redactions colored yellow because (a) pricing associated with specific contract line items is not generally available to the public and proprietary

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		with beginning Bates number USAF-ADS-0000771834.	commercial information. Disclosure of this pricing information would compromise the Air Force's future negotiating positions and (b) contact information for Air Force staff included in the document is not widely published or available to the general public as a matter of course and making it available on the public docket threatens to disrupt orderly and efficient agency operations. <i>See</i> Decl. of Barry Dickey (Air Force) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶¶ 3, 6 (filed herewith).
PX 92	672-6	Excerpt of the Army's advertising contract with DDB, with a beginning Bates number ARMY-ADS-0000245462.	Plaintiffs request redactions colored yellow because (a) metrics and data in this document are commercially sensitive and not available to the general public, and making them available on the public docket could prejudice the Army's ability to conduct business, and (b) contact information for Army staff included in the documents cited in this declaration is not widely published or available to the general public as a matter of course, and making it available on the public docket threatens to disrupt orderly and efficient agency operations. <i>See</i> Decl. of Col. John Horning (Army) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶¶ 8–9 (filed herewith).
PX 93	672-7	Excerpts from a Task Order Document for a CMS contract (75FCMC18D0046/75FCMC19F0002) with Bates number range CMS-ADS-0000011868 to CMS-ADS-0000011876.	Plaintiffs request redactions colored yellow for the pages with Bates numbers CMS-ADS-0000011874–875 because they pertain to the specific dollar amounts of indirect costs, which, if disclosed, would prejudice CMS's ability to conduct business. <i>See</i> Decl. of Christopher Koepke (CMS) ¶¶ 8–9, ECF No. 666-12.
PX 170	675-9	Email correspondence from S. Edlavitch to E. Blazar, <i>et al.</i> , with subject line "RE: CMS: SEP – Agency of Record," with attachment,	Plaintiffs request redactions colored yellow because they contain contact information for CMS staff, which, if disclosed, would threaten to disrupt orderly and

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		with Bates number range CMS-ADS-0000380931 to CMS-ADS-0000380932.	efficient agency operations. <i>See</i> Decl. of Christopher Koepke (CMS) ¶¶ 13–14, ECF No. 666-12.
Google's Exhibits			
Google's Exhibit ("DX") 62	601-1	Excerpts from the Expert Rebuttal Report of Adoria Lim, dated February 13, 2024.	Plaintiffs request redactions colored yellow because they contain details regarding USPS's spending on digital advertising and its media purchasing methodology. While the amounts are aggregated over a four-year period, there is sufficient spending information to allow USPS's competitors to learn significant information about USPS's spending, which would have a detrimental impact on USPS's business. <i>See</i> Decl. of Christopher Karpenko (USPS) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶ 5 (filed herewith).
DX 67	601-3	Email correspondence from S. Edlavitch to E. Blazer, <i>et al.</i> , with subject line "Re: OE8 Campaign results," dated January 28, 2021, with Bates number range CMS-ADS-0000373744 to CMS-ADS-0000373745.	Plaintiffs request redactions colored yellow because they contain contact information for CMS staff, which, if disclosed, would threaten to disrupt orderly and efficient agency operations. <i>See</i> Decl. of Kenneth Whitley (CMS) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶ 3 (filed herewith).
DX 71	602-1	Excerpts from email correspondence from S. Chang to C. Karpenko, <i>et al.</i> , with subject line "RE: UM Contract," with attachments, dated January 17, 2023, with Bates number range USPS-ADS-0000902290 to USPS-ADS-0000902373.	Plaintiffs request redactions colored yellow for the following: 1. Pages with Bates numbers USPS-ADS-0000902290–291 and -293 because they include the contact information of USPS staff. Disclosure of such contact information threatens to disrupt orderly and efficient agency operations; 2. Page with Bates number USPS-ADS-0000902292 because it contains the minimum and maximum ad spend USPS is willing to pay. Disclosure of such information would benefit USPS's competitors to the detriment of USPS;

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			<p>3. Pages with Bates numbers USPS-ADS-0000902354, -362 because they contain specific rates negotiated between USPS and its ad agency, Universal McCann. Disclosure of these rates would significantly limit USPS's ability to negotiate rates with other advertising agencies; and</p> <p>4. Page with Bates number USPS-ADS-0000902357 because it contains discussion concerning who USPS considers to be its key competitors in the market. Such information about key competitors is commercially sensitive and disclosure would be detrimental to the business interests of USPS.</p> <p><i>See</i> Decl. of Christopher Karpenko (USPS) ¶¶ 7–8, 11, ECF No. 666-19.</p>
DX 73	602-3	Excerpt of the Navy's advertising contract with Y&R, with Bates number beginning NAVY-ADS-0000256935.	Plaintiffs request redactions colored yellow because this document contains the agency's unit and extended pricing for its non-cost contract line items. Navy's practice is not to share unit or extended pricing for this contract on publicly accessible government portals such as SAM.gov or in response to FOIA requests. <i>See</i> Decl. of Allen Owens (Navy) ¶ 10, ECF No. 666-17.
DX 74	602-4	Excerpts from email correspondence from K. Housein to P. Jenkins, <i>et al.</i> , with subject line "LRFP 220606 Health Insurance Exchange Public Education and Outreach – Award," with attachments, dated June 14, 2022, with Bates number range CMS-ADS-0000018746 to CMS-ADS-0000018764.	Plaintiffs request redactions colored yellow because they contain contact information for CMS staff, which, if disclosed, would threaten to disrupt orderly and efficient agency operations. <i>See</i> Decl. of Kenneth Whitley (CMS) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶ 3 (filed herewith).
DX 75	602-5	2022 media plan showing digital media strategy and recommendations relative to a certain ad campaign, a Comment Resolution	Plaintiffs request redactions colored yellow because (a) the Comment Resolution Matrix is commercially sensitive in that, if disclosed, contractors could gain an

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		Matrix showing the Air Force's feedback to the plan, and a cover email noting that the ad agency incorporated the feedback and requesting Air Force's approval of the updated plan, with Bates number beginning at USAF-ADS-0000001422.	unfair advantage in understanding the Air Force's acquisition strategy and planning, (b) data on the last slide of document is not generally available to the public and contains detailed information on the recruiting efforts of the Air Force which could be used in aggregate by adversaries to compile intelligence on the Air Force's capabilities, and (c) contact information for Air Force staff included in the document is not widely published or available to the general public as a matter of course and making it available on the public docket threatens to disrupt orderly and efficient agency operations. <i>See</i> Decl. of Barry Dickey (Air Force) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶¶ 4, 6 (filed herewith).
DX 76	746	Excerpt of a task order pursuant to Contract No. 693JJ919D000003 between NHTSA and Stratacomm and a cover email about that task order, with Bates number beginning at NHTSA-ADS-0000344712.	Plaintiffs request redactions colored yellow because contact information for NHTSA staff is not widely published or available to the general public as a matter of course, and making it available on the public docket threatens to disrupt orderly and efficient agency operations. <i>See</i> Decl. of Stephen Hench (NHTSA) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶ 4 (filed herewith).
DX 77	602-6	Slide describing the Army's national media optimization process and related email correspondence, with Bates number beginning at ARMY-ADS-0000060557.	Plaintiffs request redactions colored yellow because (a) metrics and data in this document are commercially sensitive and not available to the general public, and making them available on the public docket could prejudice the Army's ability to conduct business, and (b) contact information for Army staff included in the documents cited in this declaration is not widely published or available to the general public as a matter of course, and making it available on the public docket threatens to disrupt orderly and efficient agency

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DX 97	604-4	Backup data for Figure 11 of Appendix E of the Expert Rebuttal Report of Adoria Lim.	<p>Plaintiffs request redactions colored yellow for the following:</p> <ol style="list-style-type: none"> 1. Pages 9–10 and 12–13 because they contain the unique identifiers of all the FAAs and their ad agencies, which, if disclosed, could be used for fraudulent and other nefarious purposes to the detriment of the FAAs; and 2. Pages 2, 4, 6–7, 9, 13 because they contain details regarding USPS's spending on digital advertising and granular detail regarding its media purchasing methodology. Such detailed descriptions are competitively sensitive and would be detrimental to USPS if disclosed publicly. <i>See</i> Decl. of Christopher Karpenko (USPS) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶ 5 (filed herewith).
DX 99	604-5	Digital media bills and billing memos received from the Navy's digital media contractor, with Bates number beginning at NAVY-ADS-0000373978.	Plaintiffs request redactions colored yellow because (a) contact information for Navy staff included in this document is not widely published or available to the general public as a matter of course and making that available on the public docket threatens to disrupt orderly and efficient agency operations; (b) contractor confidential financial information, including the contractor's ABA routing number, account information, swift code, lockbox and other financial information is proprietary and confidential information protected from disclosure, not widely published or available to the general public as a matter of course, and making the information available on the public docket would compromise the willingness of future

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			<p>contractors to do business with the government because of the financial risk that disclosure of that information causes for the contractor; and (c) billing information net amounts could collectively constitute proprietary and confidential information relative to the media contractor's purchases of digital media engagement. In developing its recommended strategies to address Navy requirements for media purchases, the agency identifies recommended partners, timing and amount given the Navy's available funding for the media purchase. This information should be redacted as this information could be reverse engineered to uncover the contractor's strategy for allocation of funding and selection of media placement that is considered proprietary to the government. If disclosed, the discount available to the contractor, the rate obtained by the contractor per impression, or any other information that could disclose the contractor's subcontracting relationships could adversely impact the Navy's ability to evaluate contractors in future procurements. This disclosure could adversely impact the Government's ability to independently evaluate offeror's competency, thoroughness, capability and overall value per metric during the technical and/or pricing evaluation of any follow-on requirement for this or similar services. <i>See</i> Decl. of Allen Owens (Navy) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶¶ 6-8 (filed herewith).</p>
DX 139	709-7	Invoice and backup material from GSD&M to Air Force relative to digital media, with Bates number beginning at USAF-ADS-0000506005.	Plaintiffs request redactions colored yellow because contact information for Air Force staff included in the document is not widely published or available to the general public as a matter of course and making it available on the public docket threatens to disrupt

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			orderly and efficient agency operations. <i>See</i> Decl. of Barry Dickey (Air Force) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶ 6 (filed herewith).
DX 140	709-8	Purchase documentation, invoices, and invoice backup material concerning Army's digital media buys with DDB/OMD, with Bates number beginning at ARMY-ADS-0000504378.	Plaintiffs request redactions colored yellow because (a) metrics and data in this document are commercially sensitive and not available to the general public, and making them available on the public docket could prejudice the Army's ability to conduct business, and (b) contact information for Army staff included in the documents cited in this declaration is not widely published or available to the general public as a matter of course, and making it available on the public docket threatens to disrupt orderly and efficient agency operations. <i>See</i> Decl. of Col. John Horning (Army) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶¶ 8–9 (filed herewith).
DX 142	709-10	Invoices from Universal McCann Worldwide, Inc. to USPS, dated February 17, 2022, with Bates number range USPS-ADS-0000669681 to USPS-ADS-0000669714.	<p>Plaintiffs request redactions colored yellow, which pertain to the amounts of money spent on specific categories of advertising by USPS for specific months. Such information is highly commercially sensitive and, if disclosed, could enable competitors to better counter USPS's advertising efforts.</p> <p>While these invoices are from 2022, there is sufficient continuity in USPS's advertising strategy that disclosure of these amounts or the specific categories employed by USPS and its ad agency, Universal McCann, would reveal highly sensitive information about USPS's current advertising strategies and be highly detrimental to the business of USPS.</p>

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			<i>See</i> Decl. of Christopher Karpenko (USPS) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶¶ 3–4 (filed herewith).
DX 143	709-11	An invoice from The District Communications Group to the VA, dated July 31, 2020, with Bates number range VET-AF-ADS-0000376131 to VET-AF-ADS-0000376155.	Plaintiffs request redactions colored yellow because they contain contact information for staff at the VA, which, if disclosed, would threaten to disrupt orderly and efficient agency operations. <i>See</i> Decl. of Laura Reass (the VA) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶ 3 (filed herewith).
DX 144	709-12	Digital media bills, detailed backups, subcontractor invoices, portions of the "Navy Tactical Media Reco" slides, and correspondence related to the Navy's quarterly paid media plans, with Bates number beginning at NAVY-ADS-0000250171.	Plaintiffs request redactions colored yellow because (a) contact information for Navy staff included in this document is not widely published or available to the general public as a matter of course and making that available on the public docket threatens to disrupt orderly and efficient agency operations; (b) contractor confidential financial information, including the contractor's ABA routing number, account information, swift code, lockbox and other financial information is proprietary and confidential information protected from disclosure, not widely published or available to the general public as a matter of course, and making the information available on the public docket would compromise the willingness of future contractors to do business with the government because of the financial risk that disclosure of that information causes for the contractor; and (c) billing information net amounts could collectively constitute proprietary and confidential information relative to the media contractor's purchases of digital media engagement. In developing its recommended strategies to address Navy requirements for media purchases, the agency identifies recommended partners, timing and amount given the

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			<p>Navy's available funding for the media purchase. This information should be redacted as this information could be reverse engineered to uncover the contractor's strategy for allocation of funding and selection of media placement that is considered proprietary to the government. If disclosed, the discount available to the contractor, the rate obtained by the contractor per impression, or any other information that could disclose the contractor's subcontracting relationships could adversely impact the Navy's ability to evaluate contractors in future procurements. This disclosure could adversely impact the Government's ability to independently evaluate offeror's competency, thoroughness, capability and overall value per metric during the technical and/or pricing evaluation of any follow-on requirement for this or similar services. <i>See</i> Decl. of Allen Owens (Navy) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶¶ 6-8 (filed herewith).</p>
DX 154	709-19	<p>Excerpt of a slide deck about the Army's marketing mix modeling national paid media utilization assessments, with Bates number beginning at ARMY-ADS-0000187048.</p>	<p>Plaintiffs request redactions colored yellow because (a) metrics and data in this document are commercially sensitive and not available to the general public, and making them available on the public docket could prejudice the Army's ability to conduct business, and (b) contact information for Army staff included in the documents cited in this declaration is not widely published or available to the general public as a matter of course, and making it available on the public docket threatens to disrupt orderly and efficient agency operations. <i>See</i> Decl. of Col. John Horning (Army) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶¶ 8-9 (filed herewith).</p>

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DX 155	709-20	Excerpt of a Teams meeting confirmation and a portion of the Navy's June-July "Tactical Recommendation" presentation, with Bates number beginning at NAVY-ADS-0000019114.	Plaintiffs request redactions colored yellow because (a) contact information for Navy staff included in this document is not widely published or available to the general public as a matter of course and making that available on the public docket threatens to disrupt orderly and efficient agency operations; (b) contractor confidential financial information, including the contractor's ABA routing number, account information, swift code, lockbox and other financial information is proprietary and confidential information protected from disclosure, not widely published or available to the general public as a matter of course, and making the information available on the public docket would compromise the willingness of future contractors to do business with the government because of the financial risk that disclosure of that information causes for the contractor; and (c) billing information net amounts could collectively constitute proprietary and confidential information relative to the media contractor's purchases of digital media engagement. In developing its recommended strategies to address Navy requirements for media purchases, the agency identifies recommended partners, timing and amount given the Navy's available funding for the media purchase. This information should be redacted as this information could be reverse engineered to uncover the contractor's strategy for allocation of funding and selection of media placement that is considered proprietary to the government. If disclosed, the discount available to the contractor, the rate obtained by the contractor per impression, or any other information that could disclose the contractor's subcontracting relationships

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			<p>could adversely impact the Navy's ability to evaluate contractors in future procurements. This disclosure could adversely impact the Government's ability to independently evaluate offeror's competency, thoroughness, capability and overall value per metric during the technical and/or pricing evaluation of any follow-on requirement for this or similar services. <i>See</i> Decl. of Allen Owens (Navy) in Supp. of Pls.' Resp. to Google's Mot. to Seal ¶¶ 6-8 (filed herewith).</p>